

ATTACHMENT 1

By this Attachment 1, Wuru Telecom, Inc. (“Wuru” or “Applicant”) provides responses to Questions 9, 11, and 12 of the Application.

Question 9

Applicant respectfully submits that this Application is eligible for streamlined processing pursuant to Section 63.12(a)-(b) of the Commission’s rules, 47 C.F.R. §63.12(a)-(b). Applicant is affiliated with non-dominant foreign carriers in Mexico. Nevertheless, Applicant qualifies for streamlined treatment under Section 63.12(c)(1)(i) because as noted below, Applicant qualifies for a presumption of non-dominance under Section 63.10(a)(3), 47 C.F.R. §63.10(a)(3).

Questions 11 and 12

Applicant provides the following information and certifications as required in Section 63.18(i) through (m) of the Commission’s Rules, 47 C.F.R. § 63.18(i)-(m):

(i) Applicant certifies that it is not a foreign carrier within the meaning of Section 63.09(d) of the Commission’s Rules. However, Applicant is affiliated within the meaning of Section 63.09(e) of the Commission’s Rules with the following non-dominant foreign carriers in Mexico:

- CABLEMAS TELECOMUNICACIONES, S.A. DE C.V.
- CABLEVISIÓN, S.A. DE C.V.
- CABLEVISIÓN RED, S.A. DE C.V.
- FTTH DFE MÉXICO, S.A. DE C.V.
- MÉXICO RED DE TELECOMUNICACIONES, S. DE R.L. DE C.V.
- OPERBES, S.A. DE C.V.
- TELEVISIÓN INTERNACIONAL, S.A. DE C.V.
- T.V. CABLE DE ORIENTE

Each of these entities provides telecommunications services, including international telecommunications services in Mexico.

(j) Applicant certifies that it seeks to provide international telecommunications services to all global points, except those points on the Commission’s Exclusion List. With respect to services to Mexico, an entity that owns more than 25 percent of Applicant also controls one or more carriers there. These carriers are listed in response to question (i) above.

(k) Applicant certifies that the countries referenced in paragraph (i) above, are Members of the World Trade Organization (“WTO”). The foreign carriers listed in paragraph (i), are not on the Commission’s List of Foreign Telecommunications Carriers that are presumed to Possess Market Power in Foreign Telecommunications Markets, released on January 26, 2007. Moreover, each of the foreign carriers listed in paragraph (i), has a relevant market share of less than fifty percent of the international traffic and local exchange

markets in each of its foreign destination market. In addition, the foreign carriers listed in paragraph (i), offer services in competition with dominant foreign carriers and others. Thus, Applicant satisfies Section 63.18(k)(2).

- (l) Applicant may resell international switched services of unaffiliated U.S. carriers in order to provide telecommunications services to countries where it has a foreign carrier affiliation. As demonstrated above and because Applicant's foreign carrier affiliates lack 50 percent market share in the international transport and the local access markets on the foreign end of the route, each of Applicant's foreign carrier affiliates should be presumptively found to be non-dominant pursuant to Section 63.10(a)(3) of the Commission's rules, 47 C.F.R. § 63.10(a)(3).

- (m) Applicant qualifies for a presumption of non-dominance under Section 63.10(a)(1) and (3) of the Commission's rules, 47 C.F.R. § 63.10(a)(1) and (3), because it is not a foreign carrier and, as demonstrated above in paragraph (k), its affiliation is with non-dominant foreign carriers in countries that are Members of the WTO.